

# **EXHIBIT D**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHAD STANBRO,

PLAINTIFF,

-against-

Case No.:  
19-CV-10857

WESTCHESTER COUNTY HEALTH CORPORATION,  
WESTCHESTER MEDICAL CENTER, FRANK WEBER,  
AND JOHN FULL,

DEFENDANTS.

-----X  
CHAD STANBRO,

PLAINTIFF,

-against-

Case No.:  
19-CV-10857

C.O. NADYA PALOU, C.O. RAYMOND DEAL, C.O.  
KRISTOPHER LEONARDO, C.O. RICHARD LANDRY,  
CORRECTION NURSE GARY PAGLIARO, AND  
CORRECTION SERGEANT ENRIQUE TORRES,

DEFENDANTS.

-----X  
DATE: February 26, 2021

TIME: 10:00 A.M.

DEPOSITION of the Defendant,  
GARY PAGLIARO, taken by the respective  
parties, pursuant to an Order and to the  
Federal Rules of Civil Procedure, held via  
videoconference, before Victoria Chumas, a  
Notary Public of the State of New York.

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1                   G. PAGLIARO

2 adverse effect if they have three people.

3                 Q. Now, can you describe for me  
4 the medical facility that existed at  
5 Fishkill in August of 2018?

6                 A. Yes. On the first floor is  
7 what we called the clinic. It consisted of  
8 a small emergency room, doctor's offices,  
9 some nursing offices, for examinations, a  
10 small conference room. On the other side  
11 is the dental clinic.

12                Q. On the other side of what?

13                A. So as you walk into the  
14 building, on your right-hand side would be  
15 the emergency room and, down the hallway  
16 would be the doctor's offices. On the  
17 left-hand side would be the dental.

18                Q. But this would be part of the  
19 first floor, correct?

20                A. First floor.

21                Q. Okay. Continue.

22                A. And then, if you walk in the  
23 building, instead of making a right toward  
24 the clinic, you make a left, that would be  
25 what we called the specialty area. That

1                   G. PAGLIARO  
2       would be where we would hold like  
3       cardiology clinic, endocrinology clinic,  
4       oncology clinic, so specialists would come  
5       from the outside and inmates would come  
6       from other jails to see the specialists.  
7       That was all on the first floor.

8                   Q.     And did this first floor have a  
9       name?

10                  A.     The entire building is called  
11       the RMU, regional medical unit.

12                  Q.     So the building is called RMU  
13       or just that first floor?

14                  A.     The whole building.

15                  Q.     Okay. But the first floor, how  
16       would you characterize that? First floor  
17       or any other way?

18                  A.     First floor, usually we  
19       separated clinic and specialty.

20                  Q.     Okay.

21                  A.     So that is how we would  
22       generally differentiate. It's a pretty big  
23       floor.

24                  Q.     Okay. So what else was in the  
25       RMU then?

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1 G. PAGLIARO

2 A. Okay. So if you went up to the  
3 second floor, on one side was the  
4 infirmary. That's where patients who were  
5 coming back from the hospital stay,  
6 patients who had illness stayed, patients  
7 who needed isolation for whatever reason  
8 stayed, so they had a couple of four  
9 bedrooms and a couple of single rooms. On  
10 the other side of that, which would be,  
11 just to give you an idea, directly above  
12 the clinic, would be our long-term care  
13 unit, which is more of a nursing home type  
14 unit for lack of a better description.  
15 Older gentleman needing a little bit more  
16 care, needing to be fed and changed, you  
17 know, maybe not-all-there. Typical like  
18 you would see in a nursing home. And then  
19 on the third floor, directly above the  
20 long-term care unit is the world's first  
21 Alzheimer's, a dedicated Alzheimer's unit  
22 for inmates with Alzheimer's.

23 Q. Anything else in the RMU?

24 A. The basement has dialysis.

25 Q. Anything else?

1                   G. PAGLIARO

2                 A. I mean, store rooms, supplies,  
3 stuff like that, you know.

4                 Q. Okay. Other than the RMU, were  
5 there any portions of Fishkill which  
6 constituted any medical facility where any  
7 care and treatment was rendered to any  
8 prisoners?

9                 A. We had a standalone  
10 disciplinary unit called S block, and that  
11 had a small nursing station in it.

12                Q. Was S block kind of like a SHU,  
13 a special housing unit?

14                A. SHU, is a special housing unit.

15                Q. Other than that, have we now  
16 talked about all of medical facilities at  
17 Fishkill?

18                A. Yes. To the best of my  
19 knowledge.

20                Q. Now, you mentioned that in  
21 clinic there is a doctor's office, correct?

22                A. Doctor's offices.

23                Q. Offices okay. So there would  
24 be physicians on staff at Fishkill?

25                A. Yes. Absolutely.